

Exhibit A

(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LTD. AND CLIFTON
BAY INVESTMENTS LLC F/K/A ALAMEDA
RESEARCH VENTURES LLC,

Plaintiffs,

- against -

MICHAEL KIVES, BRYAN BAUM,
K5 GLOBAL HOLDINGS LLC, K5 GLOBAL
TECHNOLOGY LLC, MBK CAPITAL LP
SERIES T, K5 GROWTH CO-INVEST I GP
LLC, K5 GLOBAL GROWTH FUND I GP
LLC, K5 GLOBAL VENTURES LLC, MOUNT
OLYMPUS CAPITAL LP, MOUNT OLYMPUS
CAPITAL LLC, K5 GLOBAL GROWTH
FUND II LP, K5 GLOBAL GROWTH FUND II
GP LLC, K5X FUND I LP, K5X FUND I LLC,
AND SGN ALBANY LLC,

Defendants.

Adv. Pro. No. 23-50411 (JTD)

JUDGMENT BY DEFAULT

Upon Plaintiffs' motion ("Motion"),² pursuant to Bankruptcy Rule 7055 and Federal Rule 55(b), for the entry of default judgment against SGN Albany LLC with respect to the Complaint

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

in the above-captioned adversary proceeding (the “Adversary Proceeding”); and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases, the Adversary Proceeding and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to Federal Rule 55(b)(2), made applicable to the Adversary Proceeding by Bankruptcy Rule 7055, judgment by default shall be entered against SGN Albany LLC with respect to all claims for relief asserted by the Plaintiffs against SGN Albany LLC in the Complaint.
3. Judgment by default is granted in favor of the Plaintiffs and against SGN Albany LLC, awarding to Plaintiffs, jointly and severally, all SGN Albany LLC’s (i) rights and interests in defendants K5 Global Holdings LLC, MBK Capital LP Series T, K5 Global Technology LLC, K5 Global Growth Co-Invest I GP LLC, K5 Global Growth Fund I GP LLC, and K5 Global

Ventures LLC that SGN Albany LLC acquired as a result of the K5 Transaction, and any proceeds thereof; and (ii) rights and interests in defendant Mount Olympus Capital LP that SGN Albany LLC acquired as a result of the Mount Olympus Transaction, and any proceeds thereof.

4. The Court shall retain exclusive jurisdiction with respect to all matters arising from or relating to the implementation, interpretation, and enforcement of this Judgment.

Date: _____, 2023
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE